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Via Electronic Mail and ECF

November 4, 2022

Hon. John P. Cronan
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. King*, 21 Cr. 56 (JPC)

Dear Judge Cronan:

We write on behalf of our client, Nikia King, to respectfully request that Ms. King's home detention bail conditions be temporarily modified to allow her to attend the funeral service of her great nephew, Quiyon Bradley, and to allow her to set her financial affairs in order prior to her incarceration.

The funeral service for Mr. Bradley will take place on November 7, 2022 from 10:00 a.m. to 12:00 p.m. at 971 Clinton Avenue, Irvington NJ 07111. Ms. King respectfully requests permission to attend the service from 9:00 a.m. to 1:00 p.m. to allow time for her to travel to and from the service.

Additionally, Ms. King respectfully requests the Court's permission to travel to institutions within Newark, with notice to her probation officer, to set her financial affairs in order. To prepare for her incarceration, Ms. King would like to tend to her bank accounts and seek assistance with her energy bills. This would necessitate her travel to banks within Newark, as well as to her home energy company's location within Newark and to La Casa de Don Pedro, an organization in Newark that provides assistance with home energy bills. Ms. King respectfully requests permission to travel—with notice to Ms. King's probation officer—to these locations within Newark over the course of four or five days, with up to four hours for each trip to allow for travel and contingencies at the institutions.

Ms. King is currently in full compliance with her conditions of release. Neither the Pretrial Services Office nor the government object to this request.

Respectfully submitted,

s/ Arlo Devlin-Brown
Arlo Devlin-Brown
Covington & Burling LLP

cc: All counsel of record via ECF

Defendant King's unopposed request is granted. Defendant may travel to 971 Clinton Avenue, Irvington, NJ 07111, between 9:00 a.m. and 1:00 p.m. on November 7, 2022 to attend the funeral services of Quiyon Bradley. In addition, between 9:00 a.m. on November 14 and 5:00 p.m. on November 18, Defendant may travel to financial institutions and La Casa de Don Pedro within Newark, NJ to set her financial affairs in order prior to her incarceration. Defendant must notify her probation officer prior to leaving her home.

SO ORDERED.

November 4, 2022
New York, NY

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN
United States District Judge